

FILED

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

2010 SEP 20 PM 3:40

JOHN ELLIOT and LAURA ELLIOTT,)

Plaintiffs,)

v.)

GREAT POINT PARTNERS, LLC,)

Defendant.)

CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

Civil Action No.

1:10CV1047-TSE/JFA

NOTICE OF REMOVAL

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

Please Take Notice that Defendant Great Point Partners, LLC, by and through its attorneys, LeClairRyan and Morrison Cohen LLP, hereby removes this action from the Circuit Court of Loudoun County, Virginia to the U.S. District Court for the Eastern District of Virginia pursuant to 28 U.S.C. § 1441. In connection therewith, Great Point Partners, LLC respectfully alleges:

1. A civil action was commenced by summons and complaint and is now pending in the Circuit Court of Loudoun County, Virginia, entitled John Elliott and Laura Elliott v. Great Point Partners, LLC, Case No. CL 63454 (the "Action"). A copy of the complaint in the Action (the "Complaint") is attached as Exhibit A.

2. The Action is a civil suit alleging fraudulent inducement to contract.

3. The Plaintiffs in the action, Laura Elliott and John Elliott are citizens of the State of Virginia, as alleged in paragraph 1 of the Complaint.

4. Defendant Great Point Partners, LLC is a Delaware Limited Liability Corporation with its principal place of business in Greenwich, Connecticut.

5. The amount in controversy alleged in the Complaint exceeds \$75,000.

6. Because there is complete diversity of citizenship between the parties, the Action is one of which the District Courts of the United States have original jurisdiction pursuant to 28 U.S.C. § 1332. Consequently, pursuant to 28 U.S.C. § 1441(a), Great Point Partners may remove this action to the U.S. District Court for the Eastern District of Virginia.

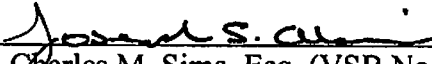
7. Great Point Partners received notice of the summons and complaint in the Action on September 15, 2010. This Petition for Removal has been filed within thirty days thereof.

WHEREFORE, Defendant Great Point Partners, LLC respectfully requests that the Action be removed to the U.S. District Court for the Eastern District of Virginia.

Dated: September 20, 2010

GREAT POINT PARTNERS, LLC

By: _____


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CERTIFICATE OF SERVICE

I certify that I have provided a true copy of the foregoing Notice of Removal via Federal Express, this 20th day of September, 2010, to:

Michael J. Seck, Esq.
Law Offices of Michael J. Seck, PLC
199 Liberty Street, SW
Leesburg, VA 20175
Counsel for Plaintiff

